## LIPMAN & BOOTH, LLC

## ATTORNEYS AT LAW www.lipmanandbooth.com

CHRISTOPHER BOOTH NOAH LIPMAN\* (RET) 11 BROADWAY, SUITE 1054 New York, New York 10004 TEL: (212) 363-6969 FAX: (212) 363-6041 cbooth@lipmanandbooth.com

January 3, 2020

The Hon. Frederic Block United States District Judge Eastern District of New York 225 Cadman Plaza Brooklyn, New York 11201 Via ECF

Re: <u>United States v. Mark Kocaj</u>,

Indictments 19-CR-575 (FB) & 19-Cr-577 (FB)

Dear Judge Block:

The defendant is at liberty upon terms of bail that include home detention and GPS monitoring. Accordingly, he requests a modification of the terms of release to permit travel to St. Maximilian Kolbe Church, Toms River, New Jersey on January 7, 2020, leaving his home at 8:45 am and returning by 2:00 pm the same day. A.U.S.A. Keith Edelman consents to this request and I have advised US Pre-trial Services Officer Leo Barrios (SDNY) and Officer Carter (EDNY) via email and am unaware of any objections.

Wherefore, it is respectfully requested that the defendant's bail conditions be modified to permit travel to Toms River, New Jersey on January 7, 2020.

Respectfully,
/s
Christopher Booth

Cc: AUSA Keith Edelman: Keith.Edelman@usdoj.gov USPO Leo Barrios: Leo\_Barrios@nyspt.uscourts.gov

USPO Carter: EMunit@nyept.uscourts.gov